



ALASKA PENINSULA CORPORATION

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June 6, 2012

Via mail and email:

Mr. Dennis McLerran, Regional
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EPA Region X
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McLerran.Dennis@epamail.epa.gov

Ms. Lisa Jackson, Administrator
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Washington, DC 20460
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Office of Environmental Information (OEI) Docket (Mail Code 28225)
Docket #EPA-HQ-ORD-2012-0276
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20450
ORD.Docket@epa.gov

RE: Request for Extension of Public Comment Period
EPA Draft Bristol Bay Watershed Assessment

Dear Ladies and Gentlemen:

Alaska Peninsula Corporation (APC) requests an extension of at least 60 days for the public comment period related to the EPA Draft Bristol Bay Watershed Assessment. The current 60-day comment period is clearly inadequate for the public to address the technical and legal merits of the assessment in question. More to the point, it is impossible for APC, a major stakeholder, to respond in the window now outlined by EPA.

APC is an Alaska Native village corporation within the meaning of the Alaska Native Claims Settlement Act. Our villages include Newhalen, Kokhanok, South Naknek, Ugashik and Port Heiden. The release of the draft Watershed Assessment coincides with the busiest time of the year for our shareholders. For, as you know, our shareholders

reside in the Bristol Bay watershed, and are engaged in subsistence hunting and fishing, as well as commercial fishing during the short window the EPA is presently allowing for public comments. APC's management, likewise, is also engaged in preparations for cultural and commercial fishing opportunities this summer. Having completed the watershed study, I am sure you are aware that the sockeye salmon run occurs in June and July. It is simply impossible for our shareholders to have any meaningful input into the draft Watershed Assessment, where the deadline for comments coincides with the end of the commercial fishing season and the commencement of the busy subsistence season.

Alaska Peninsula Corporation is also handicapped by the lack of supporting documents. We do not have access to the more than 2,000 documents that appear to be cited throughout the report and that are not included in the draft assessment. There is also a lack of scientific vetting scrutinized by multiple state and federal agencies, a matter of immense importance to us in undertaking any meaningful review and participating in public comment.

A July deadline also constitutes further proof of EPA's apparent disregard of ANCSA's command at Section 2(b) requiring maximum participation by Natives in decisions affecting their rights and property. The short window disenfranchises even APC from minimal participation. Further, the short comment period also appears to violate the EPA's own policy on consultation with Native American and Alaska Native Tribes. You cannot have meaningful participation, much less public comment, in the absence of consultation with the villages making up APC and for whom APC holds lands and other benefits received as a result of ANCSA.

APC therefore requests that the public comment period be continued for at least another 60 days, through mid-September at a minimum, that an electronic repository be made available in Alaska for the thousands of pages referenced documents, and that meaningful participation be permitted.

We look forward to your earliest favorable response.

Very truly yours,

ALASKA PENINSULA CORPORATION



Mary Jane Nielsen, President

cc: Senator Lisa Murkowski, Kristen_Daimler@murkowski.senate.gov
Senator Mark Begich, Nellen_Budd@begich.senate.gov
Congressman Don Young, Pamela.Day@mail.house.gov